

**cyber**security  
associates

A hand is shown holding a shield that is composed of binary code (0s and 1s). The shield is positioned in front of a laptop keyboard. The background is a dark blue, futuristic digital interface with various icons and data visualizations.

# Anti-Bribery Policy

## Definition

Bribery is, in the conduct of business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. Cyber Security Associates prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable.

Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Cyber Security Associate employees or by third parties acting for or on behalf of Cyber Security Associates.

## Purpose

The purpose of this policy is to convey to all employees and interested parties of Cyber Security Associates our rules in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Cyber Security Associates conducts its business in a fair, professional and legal manner.

## Offence

It is a criminal offence to:

- Offer a bribe
- Accept a bribe
- Bribe a foreign official
- As a commercial organisation, to fail to prevent a bribe

If found guilty by a court of committing bribery, someone could face up to 10 years in prison and/or an unlimited fine. Cyber Security Associates as a company could also face prosecution and be liable to pay a fine.

## Gifts and hospitality

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

## **Policy**

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for Cyber Security Associates, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with Cyber Security Associates without receiving prior written approval from the Managing Director.

Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the Managing Director.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Cyber Security Associates reserves the right to amend this policy without prior notice.

## **Enforcement**

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

Cyber Security Associates will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Cyber Security Associates takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place.

This action may result in dismissal if it is relating to an employee, or the cessation of our arrangement with any third parties.